

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
DIVISION

[Plaintiff], Elizabeth Evon Nichols

Plaintiff(s),

vs.

[Defendant], City of Portland, et al.

Defendant(s).

Civil No: 3:12-ev-1889-MO

JOINT ALTERNATE DISPUTE  
RESOLUTION REPORT

Pursuant to LR 16-4(d), the parties to all cases, unless exempt, are required to confer regarding ADR and file this report within one-hundred fifty (150) days of the initiation of a lawsuit. This report is submitted in compliance with LR 16-4(d).

1. Have counsel held settlement discussions with their clients and the opposing party?

Yes  No

If not, provide an explanation:

The parties are not ready for settlement discussions. If settlement discussions are helpful, it is likely to be after the close of expert discovery.

2. The parties propose: (*check one of the following*)

(a) That this case be referred to a neutral of their choice for ADR not sponsored by the court pursuant to LR 16-4(e)(1).

(b) That the court refer this case to mediation using a Court-sponsored mediator or staff mediator. (See LR 16-4(f) for Court-sponsored mediation procedures). The parties seek a Court mediator because:

(c) ADR may be helpful at a later date following completion of:  
**expert discovery.**

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(d) The parties believe the court would be of assistance in preparing for ADR by:

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(e) The parties do not believe that any form of ADR will assist in the resolution of this case.

(f) Other:

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DATED: March 29, 2013

By: Benjamin Haile  
Plaintiff's Attorney

By: /s/ David Landrum  
Defendant's Attorney